

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of
Telecommunications and Energy on its own motion
pursuant to G.L. c. 159, §§ 12 and 16, into Verizon
New England Inc., d/b/a Verizon Massachusetts'
provision of Special Access Services.

D.T.E. 01-34

**WORLDCOM'S AND AT&T'S SECOND SET OF INFORMATION
REQUESTS TO VERIZON**

WorldCom, Inc., and AT&T Communications of New England, Inc., hereby submit to
Verizon Massachusetts ("Verizon") the following information requests. The Department's
Ground Rules concerning information requests are incorporated herein by reference.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Please refer to the definitions below in providing responses.
8. All uses of the conjunctive include the disjunctive and vice versa. Words in the singular include the plural and vice versa.

9. Unless otherwise indicated, your responses should cover the period from January 1, 1998, to the present.
10. Each response should identify documents sufficient to demonstrate the grounds of the response. Copies of such documents, with clear indication of the particular question to which each document or group of documents is responsive, may be produced in lieu of such identification.
11. For each response, provide a detailed explanation of the methodology used to calculate the response, including the system(s) from which the data was extracted; any data included/excluded from the calculation; and the methodology and/or calculations used.
12. If you cannot answer a question or any portion of a question, answer what portions you can answer and provide a detailed explanation as to why the remainder cannot be answered. If you cannot answer a question or portion of a question because you do not compile data or keep records in a manner that permits you to answer the question, (a) state that as the reason and provide a detailed description of the manner in which you do compile the requested data or records; and (b) provide the best available data or information in whatever format it is kept.
13. Where indicated, the content of your answers should be separately broken out by:
 - a. Report Dimensions
 - (i) Verizon Retail
 - (ii) Non Affiliated Carriers Aggregate
 - (iii) Affiliated Carriers Aggregate
 - b. Service Disaggregation for each Report Dimension
 - (i) Interstate DS0, DS1, DS3, OCn by tariff under which the circuits (as defined in Instruction No. 14) have been ordered, including but not limited to:
 - (a) FCC 11
 - (b) FCC Other
 - (ii) Intrastate DS0, DS1, DS3, OCn by tariff under which the circuits (as defined in Instruction No. 14) have been ordered, including but not limited to:
 - (a) D.T.E. 10

(b) D.T.E. 15

(c) D.T.E. Other

14. Any request for the number of circuits for any time period (*e.g.*, circuits ordered or requested, or circuits installed or completed) refers to facilities (DS0, DS1, DS3, OCn) over which special services of any kind may be provided, regardless of the tariff under which the service is ordered.

Definitions

ASR means Access Service Request.

Affiliated Carrier means a carrier customer of Verizon that is affiliated with Verizon.

CATC means Carrier Account Team Center.

Central Office (“CO”) means a building in a wire center area where switching and other equipment and facilities are found.

Completion interval means the time in business days or average business days for a special service order to be completed after Verizon has received an “executable service request” (see definition below).

Customer not ready (“CNR”) means a situation where a new special services installation (see definition below) cannot be completed by Verizon by the due date, through no fault of Verizon, but because the customer or a connecting carrier is not ready for the installation to be completed. Such a situation must be coded CNR by the Verizon for it to be counted as a CNR.

Customer service record (“CSR”) means a record maintained by Verizon that has customer service details and that is commonly referred to as a CSR.

Due date means the committed date communicated by Verizon to the customer on the “FOC” (see definition below) or otherwise by which Verizon agrees to complete the order.

Executable service request (a good ASR or clean ASR) means a request by ASR, or any other form of special services request, adequate for Verizon to create a service order.

Firm order commitment (“FOC”) means Verizon’s response to an initial or supplemental ASR which provides the requesting customer with the specific date by which the requested order will be completed.

Installation trouble report means a trouble report where a trouble was found in Verizon’s network within 30 days of order completion.

ICO means Independent Company.

IOF means Inter-office facilities.

Internet Service Provider (“ISP”) means, unless otherwise indicated, an Internet Service Provider not affiliated with Verizon.

Interexchange Carrier (“IXC”) means, unless otherwise indicated, an Interexchange Carrier not affiliated with Verizon.

Jeopardy situation means a situation in which Verizon changes the due date after having offered or agreed to a due date.

New special services installation means (1) an installation for a customer to whom no special services (see definition below) have been previously installed and (2) additions to existing special services installations.

Non-affiliated carrier or **CLEC** means a Competitive Local Exchange Carrier not affiliated with Verizon.

Non-executable service request means a request by ASR, or other form of special services order, or request for special services that is not adequate for Verizon to create a service order.

On-line means using a gateway or access through the Internet.

On-time installation means a special service installation completed as verified by Verizon's customer on or before the first confirmed due date, or by a subsequent customer initiated and verified change in the order due date.

Outside Plant ("OSP") means loop transmission facilities generally used to describe the path between the customer's premises and the CO.

Past due order means an uncompleted order for which the committed due date has passed.

Policies and practices relating to employees means any policy, practice or goal relating to employee evaluation, promotion, retention, or compensation.

Special services means any service dedicated to a customer that requires circuit design including, but not limited to, any service with four wires; and any DS0, DS1, DS3 or OCn.

Trouble report means any customer direct or referred report of impaired service or an out-of-service condition where the trouble was found to be in Verizon's network or a trouble condition was not found.

Verizon Retail means an end-user that purchases any special services (as defined above) directly from Verizon under any tariff.

INFORMATION REQUESTS

1. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
 - (a) the number of circuits (as defined in Instruction No. 14) ordered or requested; and
 - (b) the number of such circuits for which a FOC, with facility check, was sent within 72 hours, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.
2. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
 - (a) the number of circuits (as defined in Instruction No. 14) ordered or requested; and
 - (b) the number of such circuits for which an ASR was either rejected or queried within 24 hours, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.
 - (c) the number of circuits (as defined in Instruction 14) ordered or requested for which the ASR was deemed “good,” but for which a FOC was not sent.
3. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
 - (a) the number of circuits (as defined in Instruction No. 14) completed;
 - (b) the number of such circuits where a reported trouble was found in the network within 30 days of the date the circuit was completed; and
 - (c) based on the number of circuits provided in response to (b) above, the average duration time from trouble receipt to trouble clearance.
4. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
 - (a) the number of circuits (as defined in Instruction No. 14) completed; and
 - (b) the number of such circuits with missed due dates; and
 - (c) the number of such missed due date circuits for which customers received jeopardy notices.
5. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
 - (a) based on the number of circuits provided in response to 3(b) above, the number of all troubles cleared; and

(b) the number of such troubles cleared that had an additional trouble reported and cleared within 30 days.

6. Please provide the demand for OSP, IOF and CO equipment forecasted as of June 30, 1999, for Massachusetts, New York, and Verizon North to be required for:

(a) January 1, 2000

(b) July 1, 2000

(c) January 1, 2001

(d) July 1, 2001.

Should the above-listed geographic areas and time periods not reflect the geographic areas and time periods for which Verizon keeps records, please provide the requested information for the geographic areas and time periods by which Verizon keeps its records.

7. Please provide the demand for OSP, IOF and CO equipment forecasted as of December 31, 1999, for Massachusetts, New York, and Verizon North to be required for:

(a) January 1, 2000

(b) July 1, 2000

(c) January 1, 2001

(d) July 1, 2001.

Should the above-listed geographic areas and time periods not reflect the geographic areas and time periods for which Verizon keeps records, please provide the requested information for the geographic areas and time periods by which Verizon keeps its records.

8. Please provide the demand for OSP, IOF and CO equipment forecasted as of June 30, 2000, for Massachusetts, New York, and Verizon North to be required for:

(a) July 1, 2000

(b) January 1, 2001

(c) July 1, 2001.

Should the above-listed geographic areas and time periods not reflect the geographic areas and time periods for which Verizon keeps records, please provide the requested information for the geographic areas and time periods by which Verizon keeps its records.

9. Please provide the demand for OSP, IOF and CO equipment forecasted as of December 31, 2000, for Massachusetts, New York, and Verizon North to be required for:

(a) January 1, 2001

(b) July 1, 2001.

Should the above-listed geographic areas and time periods not reflect the geographic areas and time periods for which Verizon keeps records, please provide the requested information for the geographic areas and time periods by which Verizon keeps its records.

10. Please provide the demand for OSP, IOF and CO equipment forecasted as of June 30, 2001, for Massachusetts, New York, and Verizon North to be required for:

(a) July 1, 2001.

Should the above-listed geographic areas and time period not reflect the geographic areas and time period for which Verizon keeps records, please provide the requested information for the geographic areas and time period by which Verizon keeps its records.

11. For calendar years 1999, 2000, and 2001, please provide a comparison of the Verizon capital budget for infrastructure augments and upgrades (OSP, IOF and CO equipment) by state for:

(a) New Jersey;

(b) Pennsylvania;

(c) New York; and

(d) Massachusetts.

12. Please state whether Verizon maintains construction relief plans for Massachusetts and/or other states in the Verizon-North footprint? If so, please provide Verizon's construction relief plans for each state in the Verizon-North footprint. By "construction relief plans," WorldCom and AT&T mean the capital budgeted to augment or build sufficient OSP, IOF and CO equipment to meet the demand forecasted by Verizon based on Verizon's knowledge of demand including, but not limited to, forecast input from CLECs and carriers.

Respectfully submitted,

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